

**N.J.A.C. 6A:9, PROFESSIONAL LICENSURE AND STANDARDS
WRITTEN TESTIMONY
BY JOANN WESTREICH, PRESIDENT, AND COMMITTEE
NEW JERSEY ASSOCIATION OF SPEECH LANGUAGE SPECIALISTS**

The New Jersey Association of Speech Language Specialists (NJASLS), an affiliate group of NJEA, appreciates the efforts of the State Department of Education regarding changes to the New Jersey Speech Correctionist endorsement and supports the proposed changes to N.J.A.C. 6A:9-13.6(d).. We feel it will give those a chance to continue and complete the upgrade program. NJASLS also favors recognizing the New Jersey Speech Correctionist endorsement for those individuals who have been actively employed as a Speech Correctionist and will continue working beyond August 31, 2015.

- (d) Individuals holding a valid New Jersey Speech Correctionist endorsement [who have completed seven years of work as a Speech Correctionist in a New Jersey school setting and a Department-approved retraining program] may serve in a position requiring speech-language specialist certification until August 31, 2015, by which date they shall have obtained the speech language specialist endorsement or completed a department approved retraining program.
- (e) An emergency certificate may be issued to a candidate who either holds a bachelor's degree in speech pathology or is currently enrolled in a master's program in speech pathology [and] in which the candidate has completed a minimum of 12 graduate semester-hours in speech pathology. All study must be completed at a regionally accredited college or university. The emergency certificate may be renewed a total of four times.

There have been many cases where the Districts have hired emergency certified personnel over duly certified Speech Language Specialists (SLS). This practice is harmful to the students. The Department of Education has the responsibility to *remind these districts that they will be held accountable* for making any request to waive legally mandated qualifications in an attempt to hire an individual under an emergency certificate, when duly certified candidates apply for that position.

Federal Regulations – IDEA 2004:

NJASLS strongly urges the Board to work with the *Office of Licensing and Credentials* and OSEP to ensure that districts discontinue the hiring of candidates on emergency certificates when duly certified Speech-Language Specialists or Speech Correctionists have applied for an available job.

We base this position on the response New Jersey Speech-Language-Hearing Association (NJSHA) received on July 18, 2008, from the *Office of Special Education Programs, U.S. Department of Education*, regarding their request for clarification about emergency certification under IDEA. This response, written by Deborah J. Morrow, Ph.D., Special Assistant to the Director, Monitoring and State Improvement Planning Division states, "*As you point out, 34 CFR sec. 300.156(b)(2)(ii), consistent with section 612(a)(14)(B)(ii) of the Act, requires States to ensure that related services personnel who deliver services in their discipline or profession have not had certification or licensure requirements waived on an emergency, temporary, or provisional basis. Accordingly, a State may not grant emergency certification to allow a district to hire emergency personnel in place of speech-language pathologists who meet applicable State personnel qualifications.*"



NJASLS

New Jersey Association of Speech-Language Specialists

P.O. Box 91 Avon-by-the-Sea, New Jersey 07717 www.njasls.org njasls@yahoo.com

In addition:

To come into compliance with federal law, remove the word "suitable" from 6A:9.6.3 (b) for the case of an emergency certificate for SLSSs. The State is at risk for repercussions from the Federal government if there is a continued disregard for appropriate credentials due to the violation of the federal regulations. The word 'suitable' is open to many different interpretations for its meaning.

Therefore, The New Jersey Association of Speech Language Specialists (NJASLS) recommends more specific criteria be included for the emergency certificate, N.J.A.C. 6A:9-13.6(e) as follows:.

An emergency certificate may be issued to a candidate who:

- Holds a bachelor's degree in speech pathology or communication disorders and is currently enrolled in a master's program in speech pathology or communication disorders, in which the candidate has completed a minimum of 12 graduate semester-hours in speech pathology.
- Holds a bachelor's degree not in speech pathology, is matriculated in a master's program in speech pathology or communication disorders, and has completed all prerequisites as required by the speech pathology or communication disorders graduate program, in which the candidate has completed a minimum of 12 graduate semester-hours in speech pathology.
- Holds a master's degree in speech pathology or communication disorders, but does not hold the New Jersey Speech Language Specialist Certificate. All subsequent study must be completed at a regionally accredited college or university.
- All study must be completed at a regionally accredited college or university. The emergency certificate may be renewed a total of four times.

Thank you for your attention to these suggestions. We hope you will take all these recommendations into consideration.